

# Exhibit D

BRIDGETTE ESCOBEDO  
LA UNIÓN DEL PUEBLO ENTERO V. TEXAS

May 11, 2022

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1                               IN THE UNITED STATES DISTRICT COURT  
2                               WESTERN DISTRICT OF TEXAS  
3                               SAN ANTONIO DIVISION

4           LA UNIÓN DEL PUEBLO                               §  
5           ENTERO, ET AL.,                                   §  
6                               PLAINTIFFS,                               §  
7                               §  
8           V.   § CASE NO. 5:21-cv-844-XR  
9                               §  
10          TEXAS, ET AL.,                                   §  
11                               DEFENDANTS.                               §

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12          OCA-GREATER HOUSTON,                               §  
13          ET AL.,   §  
14                               PLAINTIFFS,                               §  
15                               §  
16          V.   § CASE NO. 1:21-cv-0780-XR  
17                               §  
18          TEXAS SECRETARY OF STATE                               §  
19          JOHN SCOTT, ET AL,                                   §  
20                               DEFENDANTS.                               §

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21          HOUSTON AREA URBAN LEAGUE, §  
22          ET AL.,   §  
23                               PLAINTIFFS,                               §  
24                               §  
25          V.   § CASE NO. 5:21-cv-0848-XR  
26                               §  
27          GREGORY WAYNE ABBOTT,                               §  
28          ET AL.,   §  
29                               DEFENDANTS.                               §

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30          LULAC TEXAS, ET AL.,                               §  
31                               PLAINTIFFS,                               §  
32                               §  
33          V.   § CASE NO. 1:21-cv-0786-XR  
34                               §  
35          JOHN SCOTT, ET AL.,                                   §  
36                               DEFENDANTS.                               §

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37          MI FAMILIA VOTA, ET AL.,                               §  
38                               PLAINTIFFS,                               §  
39                               §  
40          V.   § CASE NO. 5:21-cv-0920-XR  
41                               §  
42          GREG ABBOTT, ET AL.,                                   §  
43                               DEFENDANTS.                               §

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1 UNITED STATES OF AMERICA, §  
PLAINTIFF, §  
2 V. § CASE NO. 5:21-cv-1085-XR  
3 THE STATE OF TEXAS, §  
4 ET AL., §  
DEFENDANTS. §

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6 ORAL 30(b)(6) DEPOSITION OF  
7 TRAVIS COUNTY CLERK REPRESENTATIVE  
8 TESTIMONY OF BRIDGETTE ESCOBEDO

9 MAY 11, 2022

10 (Reported remotely)

11 \*\*\*\*\*

12  
13 ORAL DEPOSITION OF BRIDGETTE ESCOBEDO,  
14 produced as a witness at the instance of the Plaintiff  
15 OCA-Greater Houston, and duly sworn, was taken in the  
16 above-styled and numbered cause on the 11th day of  
17 May, 2022, from 10:11 a.m. to 4:27 p.m., reported  
18 remotely via Zoom, before MICHELLE CARVER, CSR, in and  
19 for the State of Texas, reported by oral stenograph in  
20 Travis County, Texas, pursuant to the Federal Rules of  
21 Civil Procedure, the current Emergency Order regarding  
22 the COVID-19 State of Disaster, and the provisions  
23 stated on the record or attached hereto.

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1 money?

2 MS. HUNKER: Objection. Form.

3 A. Yes.

4 Q. Would you agree with me that buying  
5 someone's lunch could be considered a type of  
6 compensation?

7 A. Yes.

8 Q. Have you received any training from the  
9 Secretary of State about this particular new provision  
10 606?

11 A. No. Well, there are advisories that come  
12 out that you're -- you can read, and I have probably  
13 read that, but specific training, no.

14 Q. Do you know if there was an advisory about  
15 606?

16 A. Not specifically.

17 Q. What kind of advisories do you typically get  
18 from the Secretary of State?

19 A. They're -- they come out periodically about  
20 topics, and they are available for the public.

21 Q. Are they available -- well, are they  
22 advisories directed at elections administrators?

23 A. Yes.

24 Q. And do they -- does the Secretary of State  
25 send the advisory to you?

1 Q. And how do election workers verify the  
2 current form?

3 A. So the form was recently updated, and so we  
4 provided them with a -- with the old form and the new  
5 form so they can compare and make sure that it was the  
6 correct form they're using.

7 Q. Actually, I'm sorry. I shouldn't have asked  
8 that foundational question. Which -- what form are  
9 you referring to?

10 A. The appointment of poll watcher.

11 Q. Are you -- do you mean a certificate of --

12 A. Certificate of appointment, yes.

13 Q. Understood.

14 A. Yeah.

15 Q. Got it, thanks. Okay. And if we could flip  
16 to the next page to 4.07, and if you wouldn't mind  
17 taking a second to just read 4.07. And it starts from  
18 line 21 on page 27, and it goes through line 8 on  
19 page 28.

20 A. Okay. I'm aware.

21 Q. Okay. You do --

22 A. I've read -- yes. This one I know.

23 Q. Understood. Okay. What is your  
24 understanding of what this provision is?

25 A. The poll watcher is entitled to sit or stand

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1 near enough to hear or see what they're trying to  
2 observe.

3 Q. And did you provide any training to election  
4 workers on how to implement this provision?

5 A. We gave them the information in the Code,  
6 yes.

7 Q. And when you gave election workers this  
8 provision, did you provide any explanation on what  
9 some of the terms -- the language in this provision  
10 means?

11 A. Yes. And we had a lot of questions, but due  
12 to COVID, they were very -- the election workers were  
13 very concerned because some of the poll watchers stand  
14 very closely, and they -- a lot of the workers wanted  
15 them to maintain the -- the 6-foot social distancing.  
16 We had to educate them on the differences between  
17 asking them to stay away and allowing them to be  
18 closer. We had to let them know they had this right  
19 to do so.

20 Q. That poll watchers had --

21 A. That poll watchers had the right.

22 Q. Understood. And so let me unpack that a  
23 little bit. A moment ago you said you had a lot of  
24 questions about this provision.

25 A. Uh-huh.

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1 Q. You mean questions during the training --

2 (Simultaneous speaking)

3 A. Yes.

4 Q. Okay. And --

5 THE COURT REPORTER: I'm sorry. I need  
6 you to repeat your question. Y'all are talking at the  
7 same time, and I'm missing portions of it.

8 MR. WHITE: My fault. Thanks. I'll  
9 repeat it.

10 Q. So a moment ago you said that you had a lot  
11 of questions about this provision, and is that fair to  
12 say?

13 A. Yes.

14 Q. And these are questions that were asked  
15 during the training session that your office provided  
16 to election workers?

17 A. Yes.

18 Q. And what sorts of questions were election  
19 judges asking?

20 A. Specifically about the 6-foot distance.  
21 They wanted -- they -- they allowed the election  
22 workers -- because COVID was still in effect, they  
23 wanted to be able to ask the poll watchers to stay  
24 6-feet away from them.

25 Q. And what did you -- strike that.

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1 How did you answer those questions?

2 A. We just told them that according to this  
3 Code that they were allowed to sit or stand near  
4 enough to see or hear, and so they had to just use  
5 their best judgment with that.

6 Q. So would you agree with me that this  
7 provision prevents election workers from denying a  
8 poll watcher free movement at a polling place?

9 MR. POPE: Objection. Form.

10 MS. HUNKER: Objection. Form.

11 Q. Do you want me to repeat the question?

12 A. Yes.

13 Q. Would you agree that this provision prevents  
14 election workers from denying a poll watcher free  
15 movement at a polling site?

16 A. Yes.

17 MS. HUNKER: Same objection.

18 Q. And what is your understanding of what it  
19 means to deny a poll watcher free movement at a  
20 polling site?

21 A. To not allow them to go into a specific  
22 location or be at a specific process.

23 Q. Did the Secretary of State's Office provide  
24 any guidance on what it means to deny a poll watcher  
25 free movement at a polling place?



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1 A. Not specific items, but they did say that  
2 there was a poll watcher -- a new -- SB 1 required a  
3 new training for the poll watchers to -- to take.

4 Q. When you say "they," you're referring to the  
5 Secretary of State's Office?

6 A. Yes.

7 Q. And who in the Secretary of State's Office  
8 told you that?

9 A. The staff attorneys.

10 Q. And you also just mentioned that -- the  
11 training program for poll watchers. Are you familiar  
12 with that training program?

13 A. Yes.

14 Q. Have you completed it yourself?

15 A. Yes.

16 Q. Is there an assessment at the end of the  
17 training program that ascertains whether the poll  
18 watcher has understood the material in the program?

19 A. I don't remember.

20 Q. Okay. Would the existence of some sort of  
21 assessment at the conclusion of the training program,  
22 in your opinion, affect how effective the program is?

23 MR. POPE: Objection. Form.

24 A. Based on feedback that I heard, it's --  
25 it's -- it's not very effective.

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1 Q. And what sort of feedback have you heard?

2 A. That it is nothing more than reading the  
3 poll watcher guide.

4 Q. And where did you hear this from?

5 A. Various sources. The -- one of the party  
6 members. A member of a particular party that we  
7 contract with.

8 Q. Who was that member?

9 A. The executive director of the Republican  
10 Party (inaudible).

11 THE COURT REPORTER: I'm sorry. Can  
12 you repeat your answer?

13 A. The executive director of the Republican  
14 Party in Travis County.

15 Q. So the executive director of the Republican  
16 Party complained to you about the training program?

17 A. Well, he didn't complain. He just made a  
18 statement saying that it's not -- the training was not  
19 very helpful. There was still a lot of questions of  
20 what, you know, could and couldn't be done in a  
21 polling location.

22 Q. Understood. And what were the circumstances  
23 under which he made this or she made this statement to  
24 you?

25 A. We were trying to make sure that all of the

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1 A. Yes.

2 Q. And what does this provision do?

3 A. It says that you commit an offense if you  
4 knowingly obstruct a poll watcher from viewing  
5 something.

6 Q. And what sorts of actions can obstruct the  
7 view of a poll watcher?

8 A. If you don't allow them to see someone  
9 check -- being checked-in on a poll book or they ask  
10 to view a record.

11 Q. Did you receive any guidance from the  
12 Secretary of State's Office about the types of actions  
13 that can obstruct a poll watcher?

14 A. Not that I can recall.

15 Q. So would you agree with me that this  
16 provision makes it a criminal offense if a person  
17 obstructs the poll watcher?

18 A. Yes.

19 Q. And did you receive any concerns from  
20 election workers about this provision?

21 A. Yes.

22 Q. And what were those concerns?

23 A. So they -- the workers would have -- at the  
24 end of a training session, they would tell our  
25 trainers that it was a concern for them that they

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1 didn't want to be committed of an offense, and so they  
2 had concerns about working in the future. So, yeah,  
3 this one was -- was really -- caused a lot of concern  
4 for them.

5 Q. Do you know if there are any election  
6 workers who decided not to work in the future because  
7 of this provision?

8 A. Yes. There are several.

9 Q. There are several? Do you know how many?

10 A. I don't know exactly how many.

11 Q. More than 5?

12 A. Yes.

13 Q. More than 10?

14 A. Yes. I'd say probably between 25 to 50.

15 Q. So 25 to 50 election workers who chose not  
16 to work in the future because out of concerns of  
17 SB 1's provisions relating to poll watchers?

18 A. Yes.

19 Q. Okay. And are these individuals who had  
20 served as election workers during previous election  
21 cycles?

22 A. Yes.

23 Q. Did this lead to any staff shortages during  
24 the March 2022 primary?

25 A. Yes.

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1 Q. And how significant of staff shortages did  
2 Travis County experience?

3 A. Initially, it was -- it was quite  
4 significant; so yes.

5 Q. What impact did that have on your ability to  
6 administer the March primary election?

7 A. Well, we, Travis County, were able to get  
8 all of our polling locations fully staffed. But in  
9 the very beginning, we start recruiting quite early  
10 for the primary election like in November and  
11 December, and that was initially when SB 1 went into  
12 effect. And so there was so many unknowns, and a lot  
13 of the election workers had just heard on the news or  
14 via social media that they can be committed of an  
15 offense. And so when we were initially around that  
16 same time calling them asking them, you know, if they  
17 were interested in working the primary election, they  
18 related to us they were not interested.

19 Q. And so you were ultimately able to have all  
20 your polling sites fully staffed?

21 A. Right.

22 Q. And tell me a little bit about the process  
23 of replacing these election workers.

24 A. So we just -- we did several different  
25 things: We did a press release. We really relied on

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1 any of the provisions, we would have called the legal  
2 line, but I can't recall a specific instance where we  
3 needed guidance.

4 Q. And apologies for jumping around. A moment  
5 ago you had mentioned shortages of poll watchers and  
6 your efforts to recruit replacements. Are you  
7 concerned about staffing shortages in future  
8 elections?

9 A. Not poll watchers.

10 Q. Oh, I'm sorry.

11 A. Poll workers?

12 Q. Poll workers.

13 A. Yes.

14 Q. Excuse me. Yes?

15 A. Yes.

16 Q. "Yes" you are concerned about shortages in  
17 future elections?

18 A. Yes.

19 Q. Okay. Did your office record the number of  
20 poll watchers who report for service in a given  
21 election?

22 A. Yes.

23 Q. How does your office record that  
24 information?

25 A. There's two different avenues for recording

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1 THE COURT REPORTER: Okay. Thanks.

2 Q. Is it your position that there is no action  
3 with respect to removing a poll watcher that you  
4 wouldn't take now that you would have taken prior to  
5 SB 1?

6 A. Can you repeat the question? I'm sorry.

7 Q. Is there any action with respect to removing  
8 a poll watcher that you wouldn't take now that you  
9 would have prior to SB 1?

10 MR. WHITE: Objection. Form.

11 A. I'm not aware.

12 Q. Now, you had talked a little bit about  
13 shortages or declining -- you talked a little about  
14 shortages of election workers with respect to the poll  
15 watchers provision; is that correct?

16 A. Yes.

17 Q. Okay. Now, when you were talking about poll  
18 workers or election judges who declined to serve this  
19 term, do you know if it was the provisions of SB 1 or  
20 people's descriptions of provisions of SB 1?

21 A. It was to my -- I -- I -- I believe it was  
22 their understanding that they could be penalized  
23 criminally; they did not want to experience any of  
24 that. So that's what was told to me.

25 MR. WHITE: I'm sorry. I object to